

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 09-_____
v.	:	DATE FILED:_____
LAUREN W. ARNOLD	:	VIOLATION:
	:	18 U.S.C. § 371 (conspiracy - 1 count)
	:	18 U.S.C. § 1028A(a)(1), (c)(5)
	:	(aggravated identity theft - 10 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notice of forfeiture

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Wachovia Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate no. 33869.
2. From in or about October 2007, to in or about October 2008, defendant LAUREN W. ARNOLD worked as a roving bank teller at Wachovia Bank branches in Philadelphia, Pennsylvania.
3. In the course of her employment at Wachovia Bank, defendant LAUREN W. ARNOLD had access to customers' confidential bank account information, including account holders' names, account numbers, addresses, dates of birth, social security numbers, driver's license numbers, account balances, and copies of signature cards.

4. From in or about July 2008, to in or about October 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

LAUREN W. ARNOLD

conspired and agreed, together and with others known and unknown to the United States Attorney, to commit an offense against the United States, that is, to knowingly execute, and attempt to execute, and aid and abet the execution of, a scheme to defraud Wachovia Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Sections 1344 and 2.

MANNER AND MEANS

5. It was part of the conspiracy that defendant LAUREN W. ARNOLD sold to A.W., a person known to the United States Attorney, stolen personal identifying information about true bank customers, which A.W. used in concert with others to negotiate and attempt to negotiate stolen, counterfeit, and otherwise unauthorized checks purportedly drawn on the accounts of the true bank customers, or made payable to those customers, and to make and attempt to make unauthorized withdrawals from the true bank customers' accounts, thereby defrauding and attempting to defraud Wachovia Bank of over \$270,000.

It was further a part of the conspiracy that:

6. Defendant LAUREN W. ARNOLD agreed to provide customer account information to A.W., who did not work at the bank, in exchange for money.

7. Defendant LAUREN W. ARNOLD used her position as a teller to gain access to ten customers' account information, including their names, account numbers, addresses,

dates of birth, social security numbers, driver's license numbers, and account balances. She recorded that information and also printed copies of the customers' signature cards.

8. After recording the customers' account information and printing copies of their signature cards, defendant LAUREN W. ARNOLD contacted A.W. and told him she had the information he requested.

9. Defendant LAUREN W. ARNOLD then met with A.W. and provided him with the confidential Wachovia Bank customer account information.

10. A.W. then paid defendant LAUREN W. ARNOLD a total of \$400 for providing him with the bank customers' account information.

11. A.W. and others acting in concert with him obtained fraudulent driver's licenses in the names of the account holders defendant LAUREN W. ARNOLD had compromised.

12. A.W. and others acting in concert with him obtained stolen, counterfeit, and otherwise unauthorized checks supposedly drawn on the accounts belonging to the account holders whose account information defendant LAUREN W. ARNOLD had compromised, or made out to those account holders, and, using the fraudulent driver's licenses they had obtained, negotiated and attempted to negotiate those checks at retail stores and a bank in Pennsylvania and New Jersey. Each of the checks contained a forged signature or an incorrect account holder name paired with one of the account numbers compromised by defendant ARNOLD.

13. A.W. and others acting in concert with him also used the confidential account information provided to A.W. by defendant LAUREN W. ARNOLD, as well as the fraudulent driver's licenses they obtained, to make unauthorized withdrawals from the accounts

defendant ARNOLD had compromised. Each of the withdrawal slips contained a forged signature.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendant LAUREN W. ARNOLD, A.W., and others committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

In or about the following months, defendant LAUREN W. ARNOLD used the Wachovia Bank computer system to look up the confidential customer account information of the following Wachovia Bank customers, recorded their names, account numbers, addresses, dates of birth, social security numbers, driver's license numbers, and account balances, and printed a copy of their account signature cards:

OVERT ACT	Date	True Bank Customer
1	August 2008	A.D.
2	September 2008	A.A.
3	September 2008	P.B.
4	September 2008	T.D.
5	September 2008	C.A.
6	September 2008	T.B.
7	September 2008	R.C.
8	September 2008	J.H.
9	September 2008	G.A.
10	September 2008	A.W.A.

11. In or about September 2008, defendant LAUREN W. ARNOLD called A.W. and told him she had the Wachovia Bank customer account information he requested.

12. In or about September 2008, defendant LAUREN W. ARNOLD met with A.W. and provided to him the confidential customer account information of A.D., A.A., P.B., T.D., C.A., T.B., R.C., J.H., G.A., and A.W.A.

13. In or about September 2008, A.W. paid defendant LAUREN W. ARNOLD \$400 for providing him the confidential customer account information of A.D., A.A., P.B., T.D., C.A., T.B., R.C., J.H., G.A., and A.W.A.

14. From on or about September 17, 2008, to on or about October 24, 2008, individuals acting in concert with A.W. negotiated and attempted to negotiate approximately seven stolen, counterfeit, and otherwise unauthorized checks supposedly drawn on the accounts of, or made out to, the account holders whose account information defendant LAUREN W. ARNOLD had compromised, and made and attempted to make approximately 42 unauthorized withdrawals from the accounts compromised by defendant Arnold, stealing and attempting to steal a total of \$278,356.72 from Wachovia Bank.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH ELEVEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 and 5 through 13, and Overt Acts 1 through 14 of Count One are incorporated here.

2. On or about the following dates, in the Eastern District of Pennsylvania, and elsewhere, defendant

LAUREN W. ARNOLD

knowingly and without lawful authority possessed, transferred, and used, and aided and abetted the possession, transfer, and use of, a means of identification of another person, that is, the name, date of birth, social security number, and driver's license number of Wachovia Bank customers, identified below, during and in relation to a bank fraud, each transaction constituting a separate count:

COUNT	Date	True Bank Customer	Type of fraudulent transaction	Wachovia Bank branch location
2	9/17/2008	A.D.	counter withdrawal of \$3,900	Chalfont, PA
3	9/23/2008	A.A.	counter withdrawal of \$5,000	New York, NY
4	9/24/2008	P.B.	counter withdrawal of \$4,000	New York, NY
5	9/23/2008	T.D.	counter withdrawal of \$4,000	New York, NY
6	10/2/2008	C.A.	counter withdrawal of \$6,000	New York, NY
7	10/8/2008	T.B.	counter withdrawal of \$6,500	New York, NY

COUNT	Date	True Bank Customer	Type of fraudulent transaction	Wachovia Bank branch location
8	10/14/2008	R.C.	counter withdrawal of \$6,500	New York, NY
9	9/24/2008	J.H.	counter withdrawal of \$4,000	New York, NY
10	10/24/2008	G.A.	counter withdrawal of \$5,000	Freehold, NJ
11	10/3/2008	A.W.A.	counter withdrawal of \$6,000	New York, NY

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 371 and 2, set forth in Count One of this information, defendant

LAUREN W. ARNOLD

shall forfeiture to the United States of America any property that constitutes, or is derived from, proceeds traceable to the commission of such offenses, as charged in this indictment, including, but not limited to, the sum of \$223,159.96.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Sections 928(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other

property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2).

LAURIE MAGID
UNITED STATES ATTORNEY